

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

JASON M. TARDIFF,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 2:21-cv -00035-LEW
)	
SIGCO, INC., SIGCO, INC. INCENTIVE)	
COMPENSATION PLAN, PRINCIPAL)	
LIFE INSURANCE COMPANY, CRH)	
AMERICAS DEFERRED)	
COMPENSATION PLAN,)	
And EDRICK WITTES,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DEADLINE TO FILE
STIPULATION OF DISMISSAL

Pursuant to Rule 7(b) of the Federal Rules of Civil Procedure and Local Rule 7(a), Plaintiff Jason Tardiff (“Plaintiff”) and Defendants SIGCO, Inc., SIGCO, Inc. Incentive Compensation Plan, Edrick Wittes, CRH Americas Deferred Compensation Plan, and Principal Life Insurance Company (“Defendants”) move the Court for an enlargement of the time period set forth in this Court’s July 19, 2021 Order (ECF No. 40) to complete the settlement of this matter and file a stipulation of dismissal until September 1, 2021. In support of this motion, the parties state as follows.

- 1) The parties engaged in a court-annexed settlement conference with Magistrate Judge Nivison on July 19, 2021, at which time the parties reached a settlement in principal.
- 2) Pursuant to this Court’s July 19, 2021 Order (ECF No. 40), the parties are to complete settlement of this matter and cause to be filed a stipulation of dismissal, with prejudice and without costs, by August 18, 2021.
- 3) The parties have finalized and executed the written settlement agreement in this

matter.

4) Defendants are in the process of remitting the agreed-upon settlement payment to the Plaintiff, but do not anticipate that Plaintiff will receive the full settlement payment on or before August 18, 2021.

WHEREFORE, for the foregoing reasons, Plaintiff and Defendants respectfully request that the Court grant them an enlargement of time to and including September 1, 2021, to complete the settlement and to file a stipulation of dismissal.

Respectfully submitted,

/s/ Gisele M. Nadeau

Gisele M. Nadeau
55 Pleasant Avenue
Portland, ME 04103
(207) 671-0327
Gisele@nadeauerisalaw.com

Counsel for Plaintiff Jason Tardiff

/s/ Emily P. Crowley

John D. Gleason
Emily P. Crowley
CURTIS THAXTER LLC
One Canal Plaza, Suite 1000/P.O. Box 7320
Portland, ME 04112-7320
(207) 774-9000
jgleason@curtisthaxter.com
ecrowley@curtisthaxter.com

*Counsel for SIGCO, Inc., SIGCO, Inc. Incentive
Compensation Plan, Edrick Wittes, and
CRH Americas Deferred Compensation Plan*

/s/ Cameron R. Goodwin

Cameron R. Goodwin
Pierce Atwood, LLP
254 Commercial Street
Portland, ME 04101
(207) 791-1309
cgoodwin@pierceatwood.com

Pro Hac Vice

Brooks R. Magratten
Pierce Atwood, LLP
One Financial Plaza, 26th Floor
Providence, RI 02903
(401) 490-3422
bmagratten@pierceatwood.com

Counsel for Principal Life Insurance Company

